

EPA SLN No. KS110003

NEW APPLICATIONS

DATE: 09-01-11

FILE NUMBER: KS-110003

FEP (OPPIN ENTRY) C.B. 9/1/11
(Initial and Date)

FILE ROOM: _____
(Initial and Date)

SIG: _____
(Initial and Date)

FILE ROOM: _____
(Initial and Date)

_____ASSIGN TO PM_____ (NO DATA)

_____JACKET TO SHELF (DATA)

STATE: <u>KANSAS</u>	SLN NO. <u>KS-110003</u>
DATE REGISTERED: <u>08-23-11</u>	90-DAY DATE: <u>11-23-11</u>
SPECIFIC SPECIAL LOCAL NEED: _____	SITE: _____
_____	PEST/PROBLEM: _____
_____	_____

1. Is the State certified to issue this type of registration? _____
2. Was the EPA Application/Notification Form submitted? _____
3. Was all the required information included on the form? _____
4. Was a confidential formula submitted (for new products)? _____
5. Is this registration for a "CHANGED USE PATTERN"? _____
6. Has an FR document been prepared for this "CHANGED USE PATTERN"? _____
7. Tolerances required? _____ Established? _____ Citation: _____
8. Full labeling being used? _____ Supplemental directions? _____
9. Does label state "FOR DISTRIBUTION AND USE ONLY WITHIN (State)"? _____
10. Does full label comply with 40 CFR 162.10, as follows:
- | | |
|---|-------|
| a. Product name, brand or trademark? | _____ |
| b. Name and address of registrant? | _____ |
| c. Net contents? | _____ |
| d. Product registration number? | _____ |
| e. Producing establishment number? | _____ |
| f. Ingredient statement? | _____ |
| g. Precautionary labeling? | _____ |
| h. Directions for use for special local need? | _____ |
| i. Use classification? | _____ |
- Was proper format followed? _____
11. Is supplemental directions for use labeling satisfactory? _____
12. Was supplemental labeling compared with EPA-registered label? _____

COMMENTS: _____

1. SLN No KS-110003 2. PM 09 3. Action Code _____

4. State Issue Date

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5. Date received by EPA

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6. Date received by PM

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7. Chemical name _____

8. Chemical code _____

9. Use _____

10. Reviews requested:

	Date Sent	Due Date	Date Returned	Response Code	Response Date
HED					
EFB					
RCB					
EEB					
TB					
RD					
PM					
.S					
Precaut. Labeling					
Chemistry					
Efficacy					

11. Status _____

12. FINAL ACTION" Response code _____

Response date

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United States Environmental Protection Agency
Office of Pesticide Programs, Registration Division (7505C)
Washington, DC 20460

Application for/Notification of State Registration
of a Pesticide To Meet a Special Local Need
(Pursuant to section 24(c) of the Federal Insecticide,
Fungicide, and Rodenticide Act, as Amended)

For State Use Only

Registration No. Assigned

KS-110003 c.g.

Date Registration Issued

08-23-11 c.g.

1. Name and Address of Applicant for Registration Liphatech, Inc. 3600 W. Elm Street Milwaukee, WI 53209		2. Product is (Check one) <input checked="" type="checkbox"/> EPA-Registered EPA Registration Number 7173-286 <input type="checkbox"/> New (not EPA-registered) Attach EPA Form 8570-4, Confidential Statement of Formula for new products. EPA Company Number 7173-WI-1	
4. Product Name Rozol Prairie Dog Bait		3. Active Ingredient(s) in Product chlorophacinone	
6. Type of Registration (Give details in Item 13 or on a separate page, properly identified and attached to this form): <input type="checkbox"/> a. To permit use of a new product. <input checked="" type="checkbox"/> b. To amend EPA registrations for one or more of the following purposes: <input type="checkbox"/> (1) To permit use on additional crops or animals. <input type="checkbox"/> (2) To permit use at additional sites. <input type="checkbox"/> (3) To permit use against additional pests. <input checked="" type="checkbox"/> (4) To permit use of additional application techniques or equipment. <input type="checkbox"/> (5) To permit use at different application rates. <input type="checkbox"/> (6) Other (specify below)		5. If this is a food/feed use, a tolerance or other residue clearance is required. Cite appropriate regulations in 40 CFR Part 180, 185, and/or 186. Not a food or feed use 7. Nature of Special Local Need (check one) <input type="checkbox"/> There is no pesticide product registered by EPA for such use. <input checked="" type="checkbox"/> There is no EPA-registered pesticide product which, under the conditions of use within the State, would be as safe and/or as efficacious for such use within the terms and conditions of EPA registration. <input type="checkbox"/> An appropriate EPA-registered pesticide product is not available.	
10. Has FIFRA section 24(c) registration for this use of the product ever, by another State, been (check appropriate box(es), if known): <input checked="" type="checkbox"/> Sought <input checked="" type="checkbox"/> Issued <input type="checkbox"/> Denied <input type="checkbox"/> Cancelled <input type="checkbox"/> Suspended <input checked="" type="checkbox"/> Registration <input checked="" type="checkbox"/> Experimental Use Permit <input type="checkbox"/> No Previous Permit Action		8. If this registration is an amendment to an EPA-registered product, is it for a "new use" as defined in 40 CFR 152.3? <input type="checkbox"/> Yes (discuss in Item 13 below) <input checked="" type="checkbox"/> No 9. Has an EPA Registration or Experimental Use Permit for this chemical ever been (check applicable box(es), if known): <input checked="" type="checkbox"/> Sought <input checked="" type="checkbox"/> Issued <input checked="" type="checkbox"/> Denied <input type="checkbox"/> Cancelled <input type="checkbox"/> Suspended <input checked="" type="checkbox"/> Registration <input checked="" type="checkbox"/> Experimental Use Permit <input type="checkbox"/> No Previous Permit Action	
11. Endangered Species Act: (Give details in Item 13 or on a separate page, properly identified and attached to this form) See attached Identify the counties where this pesticide will be used. If Statewide, indicate "all." Provide a list of Federally protected endangered/threatened species which occur in the areas of proposed use. All		12. Indicate use status of Special Local Need, i.e., planned dates of use: From: 10/1/2011 To: 09/15/2012	
Signature of Applicant or Authorized Representative Thomas R. R.		13. Comments (attach additional sheet, if needed) The proposed SLN would allow Rozol Prairie Dog Bait to be applied using mechanical application equipment, in addition to the "hand baiting" technique specified on the product label. A similar SLN has already been issued by Colorado.	
Title Manager of Regulatory Affairs		Determination by State Agency This registration is for a Special Local Need and is being issued in accordance with section 24(c) of FIFRA, as amended. To the best of our knowledge, the information above is correct, except as noted in "Comments" below or in attachments.	
Telephone Number (414) 410-7230		Date July 21, 2011	
Name, Title, and Address of State Agency Official Judy Glass, Pesticide Registration Specialist Judy Glass Pesticide and Fertilizer Program Kansas Department of Agriculture 901 SW 9th Street, Topeka, KS 66612		Comments (by State Agency Only)	
Title Pesticide Registration Specialist		Received by EPA	
Telephone Number 785-296-3454		Date 8/23/2011	



3600 WEST ELM STREET
MILWAUKEE, WI 53209
Tel: 414/351 1476 800/351 1476
Fax: 414/247 8166

Ms. Judy Glass
Kansas Department of Agriculture
109 SW 9th Street
Topeka, KS 66612-1272

May 13, 2011

Re: Application to extend the FIFRA Sec. 24(c) special local need
registration of Rozol Prairie Dog Bait, EPA SLN No. KS 100003

Dear Ms. Glass,

The enclosed application is submitted in order to extend SLN No. KS 100003 through the next season of use for Rozol Prairie Dog Bait (October 2011 through March 15, 2012). This SLN label allows the bait to be applied using mechanical bait placement machines. The label that was approved last December expired on March 15, 2011, and this our formal application to extend this SLN through the next season.

As we have discussed, Liphatech has a pending amendment application at EPA, which would change the product label to make machine application legal. If this amendment is accepted by EPA, we would immediately request cancellation of SLN No. KS 100003. Justification for this SLN has previously been submitted to you, so I am not re-submitting all of the supporting information.

We have, of course, enclosed a proposed SLN label, which is unchanged from the previous version other than showing an expiration date of March 15, 2012.

Thank you for your attention to this matter, and please feel free to contact me directly if you have questions or concerns regarding this application.

Sincerely

Thomas J Schmit
Manager of Regulatory Affairs

RESTRICTED USE PESTICIDE

DUE TO POTENTIAL SECONDARY TOXICITY TO NONTARGET ORGANISMS

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

24(c) SUPPLEMENTAL LABEL

FOR DISTRIBUTION AND USE ONLY WITHIN THE STATE OF KANSAS

This label valid until March 15, 2012, or until otherwise amended, disapproved or withdrawn

rozol®

PRAIRIE DOG BAIT

EPA SLN No. KS-110003

EPA Registration No. 7173-286

EPA Est No. 7173-WI-1

FOR APPLICATION BY MECHANICAL BAIT PLACEMENT MACHINE TO CONTROL BLACK-TAILED PRAIRIE DOGS (*Cynomys ludovicianus*) ON RANGELAND AND ADJACENT NONCROP AREAS

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling, which includes this supplemental label and the label for Rozol Prairie Dog Bait, EPA Reg. No. 7173-286. Both of these labels must be in the possession of the user at the time of application. Follow all directions of this supplemental label and all applicable directions, restrictions and precautions on the label for EPA Reg. No. 7173-286.

Use restrictions: This product may only be used in underground applications to control black-tailed prairie dogs (*Cynomys ludovicianus*) on rangeland and noncrop areas in Kansas. Apply between October 1 and March 15 of the following year, when animals will most readily take the grain bait. This product is toxic to nontarget wildlife and fish. Do not allow bait to be placed outside of the prairie dog burrow. Do not allow children, pets, domestic animals or persons not involved in the application to be in the area where the product is being applied. Do not allow livestock to graze in treated areas for 14 days after treatment and when no bait is found above ground. Before applying this product, identify active prairie dog burrows by visual observation. The openings of active burrows will generally be free of leaves, seeds, other debris or spider webs, and will show freshly turned earth, and have prairie dog feces nearby.

Application: Apply 1/4 cup (53 grams or nearly 2 ounces) of bait at least 6 inches down active prairie dog burrows. Application may be made a mechanical bait application machine that is designed, constructed and operated in a manner that ensures that bait is properly placed at least 6 inches down the prairie dog burrows.

Make sure no bait is left on the soil surface at the time of application. Applicator must retrieve and dispose of any bait that is spilled above ground or placed less than 6 inches down the burrow entrance. Mechanical bait application machines must be calibrated to ensure that the proper amount of bait is dispensed into each prairie dog burrow.

Follow-up: The applicator must return to the site within 4 days after bait application, and at 1 to 2 day intervals, to collect and properly dispose of any bait or dead or dying prairie dogs found on the surface. The applicator must follow all label instructions for conducting carcass searches, proper disposal of carcasses, and reapplication.

24(c) registrant

LIPHA TECH

Liphatech, Inc.
3600 W. Elm Street
Milwaukee, WI 53209
(414) 351-1476

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin because it may reduce the clotting ability of blood and cause bleeding. Keep away from children, domestic animals and pets. Do not get in eyes on skin or on clothing. All handlers (including applicators) must wear shoes plus socks, and gloves. Any person who retrieves carcasses or unused bait following application of this product must wear gloves.

USER SAFETY REQUIREMENTS: Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet and change into clean clothing.

FIRST AID: Have label when obtaining treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor.

If on skin: Take off contaminated clothing. Rinse skin with plenty of cool water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

TREATMENT FOR PET POISONING: If animal eats bait, call veterinarian at once.

NOTE TO PHYSICIAN OR VETERINARIAN: Anticoagulant Chlorophacinone: If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans or dogs that have ingested this product and/or have obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K₁ intramuscularly or orally.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait. Do not apply directly to water, or to areas where surface water is present. Do not contaminate water by cleaning of equipment or disposal of wastes. Runoff also may be hazardous to aquatic organisms in water adjacent to treated areas.

ENDANGERED SPECIES CONSIDERATIONS: NOTICE: It is a Federal offense to use any pesticide in a manner that results in the death of an endangered species. Use of this product may pose a hazard to endangered or threatened species. Do not use this product within prairie dog towns in the range of the black-footed ferret without first contacting endangered species specialists at a U.S. Fish and Wildlife Service office. Applicators may obtain information regarding the occurrence of endangered species and use limitations for this product by calling EPA's "Endangered Species Hotline" at 1-800-447-3813 to obtain an "Interim Measures" pamphlet for your county. You may also consult your local agricultural extension office or state pesticide lead agency to determine if there are any requirements for use of this product.

RESTRICTED USE PESTICIDE DUE TO HAZARD TO NONTARGET ORGANISMS

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certification.



Active Ingredient: chlorophacinone	0.005%
Inert Ingredients	99.995%
Total	100.000%

EPA Reg. No. 7173-286

EPA Est. No. 7173-WI-1

KEEP OUT OF REACH OF CHILDREN

CAUTION: See side panel for additional precautionary statements.

LIPHATECH

Liphatech, Inc.
3600 W. Elm Street
Milwaukee, WI 53209
(414) 351-1476

NET WEIGHT:

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ THIS LABEL and follow all use directions and precautions. Only use for sites, pests, and application methods specified on this label.

IMPORTANT: Do not expose children, pets, or other nontarget animals to rodenticides. To help prevent accidents:

1. Store product not in use in a location out of reach of children and pets.
2. Dispose of product container, unused, spoiled and unconsumed bait as specified on this label.

Use restrictions: This product may only be used as follows:

1. **Sites/Pests:** Black-Tailed Prairie Dogs (*Cynomys ludovicianus*) on rangeland and adjacent noncrop areas.

2. **States:** Colorado, Kansas, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas and Wyoming.

3. **Application Method:** Hand application of bait, at least 6 inches down prairie dog burrows. This product may only be used in underground applications. Do not apply bait on or above ground level. Treat only active burrows.

4. **Treatment Period:** Apply between October 1 and March 15 of the following year, when animals will most readily take the grain bait.

5. **Non-Applicators:** Do not allow children, pets, domestic animals or persons not involved in the application to be in the area where the product is being applied.

6. **Grazing Restriction:** Do not allow livestock to graze in treated areas for 14 days after treatment and when no bait is found above ground.

Site Assessment: Before applying this product, identify active prairie dog burrows by visual observation. The openings of active burrows will generally be free of leaves, seeds, other debris or spider webs, and will show freshly turned earth, and have prairie dog feces nearby.

Application: Apply 1/4 cup (53 grams or nearly 2 ounces) of bait at least 6 inches down active prairie dog burrows. Make sure no bait is left on the soil surface at the time of application. Applicator must retrieve and dispose of any bait that is spilled above ground or placed less than 6 inches down the burrow entrance.

Follow-up: Prairie dogs that have eaten this bait will begin to die off in 4 to 5 days after they eat a lethal amount. The applicator must return to the site within 4 days after bait application, and at 1 to 2 day intervals, to collect and properly dispose of any bait or dead or dying prairie dogs found on the surface. All carcasses found above ground must be collected and disposed of properly. Continue to collect and dispose of dead or dying prairie dogs and search for nontarget animals for at least two weeks, but longer if carcasses are still being found at that time. Carcass collections should occur in late afternoon, near sundown, to reduce the potential of nocturnal animals finding carcasses and dying animals. Bury carcasses on site in holes dug at least 18 inches deep or in inactive burrows (no longer being used by prairie dogs or other species) to avoid non-target animal scavenging. Burial includes covering and packing the hole or burrow with soil. If burial is not practical (due to frozen ground, etc) and other disposal methods are allowed by state and local authorities, collected carcasses may be disposed of by such other methods as insure that the carcasses are inaccessible to scavengers.

Reapplication: If prairie dog activity persists several weeks or months after the bait was applied, a second application may be made, by treating burrows in the same manner, time period and procedure as the first application. Follow all application, site assessment and follow-up directions and use restrictions as found above.

WARRANTY: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions. (081910)

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **Pesticide Storage:** Store only in original container in a cool, dry place inaccessible to children and pets. Keep containers closed and away from other chemicals. **Pesticide Disposal:** Wastes resulting from the use of this product may be placed in trash or delivered to an approved waste disposal facility. **Container Handling:** Nonrefillable container. Do not reuse or refill this container. Dispose of empty container by placing in trash, at an approved waste disposal facility or by incineration or, if allowed by state and local authorities, by burning. If burned stay out of smoke.

MATERIAL SAFETY DATA SHEET

SECTION 1 PRODUCT & COMPANY IDENTIFICATION

Rozol[®] Prairie Dog Bait

EPA Reg. No. 7173-288, Restricted Use Pesticide

Other Designation: Anticoagulant rodenticide with Chlorophacinone
Manufacturer: Liphatech, Inc.
3800 W. Elm Street, Milwaukee, WI 53209

Emergency Phone: 414-351-1476 Monday-Friday, 8:00 am-4:30 pm CST
After Hours: Call CHEMTREC at 1-800-424-9300

SECTION 2 INGREDIENT INFORMATION

Hazardous Ingredient	CAS Number	CSHA PEL	ACGIH TLV	ACGIH STEL
Chlorophacinone	3981-35-8	Not assigned	Not assigned	Not assigned

SECTION 3 HAZARDS IDENTIFICATION

Emergency Overview: May be harmful if swallowed or absorbed through the skin, because this material may reduce the clotting ability of the blood and cause bleeding.

Primary Entry Routes: Oral (swallowing), dermal (absorption through skin)

Acute Effects (Signs and Symptoms of Overexposure):

- Eyes: May cause temporary eye irritation.

- Skin: May be harmful if absorbed through skin. Symptoms of toxicity include lethargy, loss of appetite, reduced blood clotting ability and bleeding.

- Inhalation: Due to this product's solid form, inhalation is unlikely.

- Ingestion: May be harmful if swallowed. Symptoms of toxicity include lethargy, loss of appetite, reduced clotting ability of blood, and bleeding.

Chronic Effects: Prolonged and/or repeated exposure to small amounts of product can produce cumulative toxicity. Symptoms of toxicity include lethargy, loss of appetite, reduced clotting ability of blood, and bleeding.

Medical Conditions Aggravated by Exposure: Bleeding disorders

Target Organs: Blood

Carcinogenicity: Contains no known or suspected carcinogens.

HMS: Health - 2, Flammability - 0, Reactivity - 0

SECTION 4 FIRST AID MEASURES

Eyes: Flush with water. Get medical attention if irritation persists.

Skin: Wash with soap and water. Get medical attention if irritation persists.

Inhalation: If inhaled, remove person to fresh air and Get medical attention.

Ingestion: Call a physician or poison control center immediately. Have the product label available for medical personnel to read.

Induce vomiting under the direction of medical personnel. Drink 1 or 2 glasses of water and induce vomiting by touching the back of throat with finger. If syrup of Ipecac is available, give 1 tablespoon (15 mL) followed by 1 or 2 glasses of water. If vomiting does not occur within 20 minutes, repeat this dosage once. Do not induce vomiting or give anything by mouth to an unconscious person.

Note to Physician: This rodenticide contains an anticoagulant ingredient. If ingested, administer vitamin K₁ intramuscularly or orally, as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothrombin times.

For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents) call the National Pesticide Information Center at 1-800-858-7378.

SECTION 5 FIRE FIGHTING MEASURES

Flash Point:	None
Autoignition Temp.:	Not determined
Explosive Limits:	LEL: Not applicable UEL: Not applicable
Extinguishing Media:	Use media suitable for the surrounding fire
Unusual Fire or Explosion Hazards:	None known
Fire Fighting Instructions:	Firefighters should wear self-contained breathing apparatus (full facepiece) and full protective clothing. Contain runoff to prevent pollution.



SECTION 6 ACCIDENTAL RELEASE MEASURES

Large Spill/Leak Procedures: Isolate and contain spill. Limit access to the spill area to necessary personnel. Do not allow spilled material to enter sewers, streams or other waters. Scoop up spilled material and place in a closed, labeled container for use or disposal.

Small Spills: Scoop up material for use according to label instructions.

SECTION 7 STORAGE AND HANDLING

Storage Requirements: Store in original container in a cool, dry area out of reach of children, pets and domestic animals. Do not contaminate water, food or feed. Keep container tightly closed. Do not remove or destroy the product label.

Handling Precautions: Read the entire product label before using this rodenticide. Carefully follow all cautions, directions and use restrictions on the label. Avoid contact with eyes, skin or clothing.

SECTION 8 EXPOSURE CONTROLS/ PERSONAL PROTECTION

Ventilation: Special ventilation is not required for the normal handling and use of this product when following the label instructions.

Protective Clothing/Equipment: Wear gloves when handling bait.

Respirator: None required when used according to label instructions.

Contaminated Equipment: Damaged or unwanted bait stations and bait holders should be wrapped in paper and discarded in trash.

Comments: Never eat, drink or smoke in work areas. Practice good personal hygiene after using this product. Wash arms, hands and face with soap and water after handling this product, and before eating and smoking. Launder contaminated clothing separate from street clothes.

SECTION 9 PHYSICAL & CHEMICAL PROPERTIES

Physical State:	Solid particles	Water Solubility:	Negligible
Color:	Green	% Volatile (Volume):	Not applicable
Odor:	Raw grain odor	Specific Gravity:	1.25 g/cc
Melting Point:	Not available	Vapor Pressure:	Not applicable
Boiling Point:	Not applicable	Vapor Density:	Not applicable
Freezing Point:	Not applicable	pH:	Not applicable

SECTION 10 STABILITY AND REACTIVITY

Stability: Stable

Conditions to Avoid: None

Hazardous Polymerization: Will not occur

Chemical Incompatibilities: None

Hazardous Products of Decomposition: Oxides of carbon

SECTION 11 TOXICOLOGICAL INFORMATION

Eye Effects/Eye Irritation:	Mild, transient irritant
Acute Oral Effects:	LD ₅₀ (oral-rat): >5000 mg/kg
Acute Inhalation Effects:	No data available
Acute Dermal Effects:	LD ₅₀ (dermal-rabbit): >2000 mg/kg
Skin Irritation:	Non-irritating
Skin Sensitization:	Not a skin sensitizer

SECTION 12 ECOLOGICAL INFORMATION

This product is toxic to fish and wildlife. Do not apply this product directly to water, where surface water is present or to intertidal areas below the mean high water mark. Carefully follow label cautions and instructions to reduce hazards to children, pets and non-target wildlife.

SECTION 13 DISPOSAL CONSIDERATIONS

Disposal: Wastes resulting from the use of this product according to the label instructions must be disposed of as specified on the product label.

RCRA Waste Status: This product is not regulated as a hazardous waste under RCRA. State and local regulation may affect the disposal of this product. Consult your state or local environmental agency for disposal of waste generated other than by use according to label instructions.

SECTION 14 TRANSPORT INFORMATION

Transportation Data (49 CFR):	This product is not regulated as a hazardous material for all modes of transportation within the U.S.
Hazard Class:	Not applicable
ID No.:	Not applicable

SECTION 15 REGULATORY INFORMATION

TSCA: All components of this product are listed on the TSCA Inventory, SARA Section 313: Contains no reportable components.

OSHA Hazard Classification: Chronic health hazard.

Proposition 65: Contains no components subject to warning requirements.

SECTION 16 OTHER INFORMATION

Prepared by: T. Schmit

Date: 7/8/2009

Information presented on this Material Safety Data Sheet is believed to be accurate at the time of publication. No warranty, expressed or implied, is made with regard to this information. This information may not be adequate for every application, and the user must determine the suitability of this information due to the manner/conditions of use, storage or local regulation.

SUMMARY: As of August 8, 2011, it is a violation of Federal law to use Rozol Prairie Dog Bait in the states of Montana, New Mexico, North Dakota, and South Dakota. This is the case even though existing stocks of Rozol Prairie Dog Bait may bear labeling for these states. No person may sell or distribute such existing stocks to a retail customer unless a copy of this order is first provided to the customer. Other transfers of such existing stocks also require providing a copy of this order to the recipient, as described in the order.

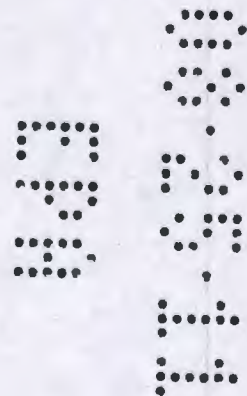


US Environmental Protection Agency Office of Pesticide Programs

**Final Cancellation Order for Rozol Prairie Dog Bait Labeled For Use in
Montana, New Mexico, North Dakota, and South Dakota**

August 8, 2011

**Electronically available at:
<http://www.epa.gov/pesticides/regulating/rozol.html>**



**Final Cancellation Order for Rozol Prairie Dog Bait Labeled for Use in
Montana, New Mexico, North Dakota, and South Dakota**

Background

On July 27, 2011, the U.S. District Court for the District of Columbia issued an order requiring EPA to take certain measures respecting the registration of Rozol Prairie Dog Bait (EPA Reg. No. 7173-286), pending the completion of endangered species consultation between EPA and the United States Fish and Wildlife Service regarding this product. See *Defenders of Wildlife v. Jackson*, No. 09-cv-1814, July 27, 2011.

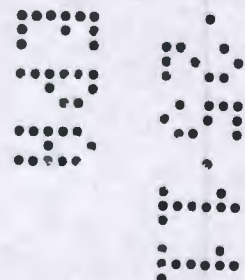
Pursuant to court order, on August 8, 2011, EPA approved an application from the product registrant (Liphatech) to amend the label for this product. The label amendment removed Montana, New Mexico, North Dakota, and South Dakota from the list of states where use is authorized. The Court also directed EPA to issue an immediately effective cancellation order respecting Rozol Prairie Dog Bait labeled for use in Montana, New Mexico, North Dakota, and South Dakota, to address any existing stocks of such product.

Neither of these actions limit use of Rozol Prairie Dog Bait, consistent with product labeling, in the remaining six states: Colorado, Kansas, Nebraska, Oklahoma, Texas, and Wyoming.

Liphatech may not sell or distribute existing stocks in its possession and control unless they have been relabeled, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act ("FIFRA") and its implementing regulations, to eliminate the portion of the labeling authorizing use in Montana, New Mexico, North Dakota, and South Dakota. See Paragraph 3 of this order. Once such existing stocks are relabeled consistent with Paragraph 3 of this order, they are no longer existing stocks subject to this order. See the definition of "existing stocks" in Paragraph 2.

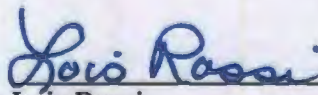

Existing stocks that have not been relabeled to eliminate the portions of the labeling authorizing use in Montana, New Mexico, North Dakota, and South Dakota (in accordance with FIFRA and its implementing regulations) are subject to a separate provision of this cancellation order (Paragraph 4), which establishes, independent of the labeling, a FIFRA prohibition on use in these four states. Paragraph 4 furthermore restricts the conditions under which such existing stocks may be sold or distributed. One particular restriction on the sale and distribution of such existing stocks (Paragraph 4.C.) applies even outside of Montana, New Mexico, North Dakota, and South Dakota.

Finally, this order makes clear that it is not based on an EPA determination under FIFRA section 6(b), and does not trigger the procedural requirements at 40 CFR Part 164 Subpart D in the event that EPA later receives an application to amend the label for Rozol Prairie Dog Bait, to add Montana, New Mexico, North Dakota, and South Dakota back to the label. Pursuant to the directions of the Court, EPA is issuing this cancellation order, effective immediately, under FIFRA section 6(a).



Final Cancellation Order

1. Pursuant to section 6(a)(1) of FIFRA and the July 27, 2011 order of the U.S. District Court for the District of Columbia, EPA hereby issues a final cancellation order for Rozol Prairie Dog Bait (EPA Registration No. 7173-286) that is labeled for use in Montana, New Mexico, North Dakota, and South Dakota. Any distribution, sale, or use of existing stocks in a manner inconsistent with this order will be considered a violation of FIFRA sections 12(a)(2)(K) and/or 12(a)(1)(A). This order is immediately effective and will remain in effect unless and until it is amended.
2. For purposes of this order, the term "existing stocks," is defined, consistent with EPA's existing stocks policy (56 FR 29362, June 26, 1991) as those stocks of Rozol Prairie Dog Bait labeled for use in Montana, New Mexico, North Dakota, and South Dakota that are currently in the United States and which were packaged, labeled, and released for shipment prior to the August 8, 2011 label amendment to delete use in Montana, New Mexico, North Dakota, and South Dakota.
3. Liphatech may not sell or distribute existing stocks within its possession or control unless those stocks have been labeled in accordance with FIFRA and its implementing regulations to prohibit use in Montana, New Mexico, North Dakota, and South Dakota.
4. With respect to existing stocks bearing labels indicating that use in Montana, New Mexico, North Dakota, and South Dakota is allowed:
 - A. No person may use such existing stocks in Montana, New Mexico, North Dakota, or South Dakota.
 - B. No person may sell or distribute such existing stocks in Montana, New Mexico, North Dakota, and South Dakota, unless such sale or distribution is for the purpose of disposal, returning the material to the person from whom it was purchased, or for transfer for the purpose of resale outside of Montana, New Mexico, North Dakota, or South Dakota.
 - C. No person may sell or distribute such existing stocks to another person unless, for each such transfer, a copy of this order is provided to such other person at or before the time of the transfer and, additionally, another copy is shipped with the stocks if they are transported by a third party.
 - D. Distribution or sale of such existing stocks, except as prohibited under paragraphs 4.B and 4.C., is permitted until such stocks are depleted. No person may use such existing stocks in a manner that is inconsistent with the previously-approved product labeling.
5. This cancellation order is not based on any determination by EPA under FIFRA section 6(b), or on a final cancellation order as that term is used in 40 CFR 164.130.


Lois Rossi
Director, Registration Division

Date

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

AUG - 8 2011

Mr. Thomas Schmit
Liphatech
3600 West Elm Street
Milwaukee, WI 53209

Dear Mr. Schmitt:

Subject: Label Amendment; Revised Directions for Use
Rozol Prairie Dog Bait
EPA Reg. No.: 7173- 286
Your Application Dated: July 29, 2011

The proposed labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable. A stamped copy is enclosed for your records. Please submit two copies of your final printed labeling before you release the product for shipment.

EPA is approving this amendment request pursuant to the order of the United States District Court for the District of Columbia. See *Defenders of Wildlife v. Jackson*, No. 09-cv-1814, July 27, 2011 Order. Approval of this label amendment does not affect any of the modified conditions of registration listed in EPA's October 29, 2009 letter to you. Any unfilled conditions of registration listed in the letter are still applicable.

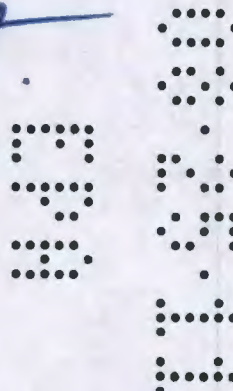
If you have any questions, please contact me by phone at: (703) 308-6249, or by email at: hebert.john@epa.gov.

Regards,

A handwritten signature in blue ink, appearing to read "John Hebert".

John Hebert, PM 7
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure



PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin because it may reduce the clotting ability of blood and cause bleeding. Keep away from children, domestic animals and pets. Do not get in eyes on skin or on clothing. All handlers (including applicators) must wear shoes plus socks, and gloves. Any person who retrieves carcasses or unused bait following application of this product must wear gloves.

USER SAFETY REQUIREMENTS: Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet and change into clean clothing.

FIRST AID: Have label when obtaining treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor.

If on skin: Take off contaminated clothing. Rinse skin with plenty of cool water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

TREATMENT FOR PET POISONING: If animal eats bait, call veterinarian at once.

NOTE TO PHYSICIAN OR VETERINARIAN: Anticoagulant Chlorophacinone: If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans or dogs that have ingested this product and/or have obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K₁ intramuscularly or orally.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait. Do not apply directly to water, or to areas where surface water is present. Do not contaminate water by cleaning of equipment or disposal of wastes. Runoff also may be hazardous to aquatic organisms in water adjacent to treated areas.

ENDANGERED SPECIES CONSIDERATIONS: NOTICE: It is a Federal offense to use any pesticide in a manner that results in the death of an endangered species. Use of this product may pose a hazard to endangered or threatened species. Do not use this product within prairie dog towns in the range of the black-footed ferret without first contacting endangered species specialists at a U.S. Fish and Wildlife Service office. Applicators may obtain information regarding the occurrence of endangered species and use limitations for this product by calling EPA's "Endangered Species Hotline" at 1-800-447-3813 to obtain an "Interim Measures" pamphlet for your county. You may also consult your local agricultural extension office or state pesticide lead agency to determine if there are any requirements for use of this product.

RESTRICTED USE PESTICIDE DUE TO HAZARD TO NONTARGET ORGANISMS

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certification.



Active Ingredient: chlorophacinone	0.005%
Inert Ingredients	99.995%
Total	100.000%

EPA Reg. No. 7173-286

EPA Est. No. 7173-WI-1

KEEP OUT OF REACH OF CHILDREN

CAUTION: See side panel for additional precautionary statements.

LIPHATECH

Liphatech, Inc.
3600 W. Elm Street
Milwaukee, WI 53209
(414) 351-1476

ACCEPTED
AUG - 8, 2011

NET WEIGHT:

Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under:

EPA Reg. No. 7173-286

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ THIS LABEL and follow all use directions and precautions. Only use for sites, pests, and application methods specified on this label.

IMPORTANT: Do not expose children, pets, or other nontarget animals to rodenticides. To help prevent accidents:

1. Store product not in use in a location out of reach of children and pets.
2. Dispose of product container, unused, spoiled and unconsumed bait as specified on this label.

Use restrictions: This product may only be used as follows:

1. Sites/Pests: Black-Tailed Prairie Dogs (*Cynomys ludovicianus*) on rangeland and adjacent noncrop areas.
2. States: Colorado, Kansas, Nebraska, Oklahoma, Texas and Wyoming.
3. Application Method: Hand application of bait, at least 6 inches down prairie dog burrows. This product may only be used in underground applications. Do not apply bait on or above ground level. Treat only active burrows.
4. Treatment Period: Apply between October 1 and March 15 of the following year, when animals will most readily take the grain bait.
5. Non-Applicators: Do not allow children, pets, domestic animals or persons not involved in the application to be in the area where the product is being applied.
6. Grazing Restriction: Do not allow livestock to graze in treated areas for 14 days after treatment and when no bait is found above ground.

Site Assessment: Before applying this product, identify active prairie dog burrows by visual observation. The openings of active burrows will generally be free of leaves, seeds, other debris or spider webs, and will show freshly turned earth, and have prairie dog feces nearby.

Application: Apply 1/4 cup (53 grams or nearly 2 ounces) of bait at least 6 inches down active prairie dog burrows. Make sure no bait is left on the soil surface at the time of application. Applicator must retrieve and dispose of any bait that is spilled above ground or placed less than 6 inches down the burrow entrance.

Follow-up: Prairie dogs that have eaten this bait will begin to die off in 4 to 5 days after they eat a lethal amount. The applicator must return to the site within 4 days after bait application, and at 1 to 2 day intervals, to collect and properly dispose of any bait or dead or dying prairie dogs found on the surface. All carcasses found above ground must be collected and disposed of properly. Continue to collect and dispose of dead or dying prairie dogs and search for nontarget animals for at least two weeks, but longer if carcasses are still being found at that time. Carcass collections should occur in late afternoon, near sundown, to reduce the potential of nocturnal animals finding carcasses and dying animals. Bury carcasses on site in holes dug at least 18 inches deep or in inactive burrows (no longer being used by prairie dogs or other species) to avoid non-target animal scavenging. Burial includes covering and packing the hole or burrow with soil. If burial is not practical (due to frozen ground, etc) and other disposal methods are allowed by state and local authorities, collected carcasses may be disposed of by such other methods as insure that the carcasses are inaccessible to scavengers.

Reapplication: If prairie dog activity persists several weeks or months after the bait was applied, a second application may be made, by treating burrows in the same manner, time period and procedure as the first application. Follow all application, site assessment and follow-up directions and use restrictions as found above.

WARRANTY: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions. (072611)

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **Pesticide Storage:** Store only in original container in a cool, dry place inaccessible to children and pets. Keep containers closed and away from other chemicals. **Pesticide Disposal:** Wastes resulting from the use of this product may be placed in trash or delivered to an approved waste disposal facility. **Container Handling:** Nonrefillable container. Do not reuse or refill this container. Dispose of empty container by placing in trash, at an approved waste disposal facility or by incineration, if allowed by state and local authorities, by burning. If burned stay out of smoke.

109 SW 9th Street, 3rd Floor
Topeka, Kansas 66612-1280

Dale A. Rodman, Secretary
Gary D. Meyer, Program Manager

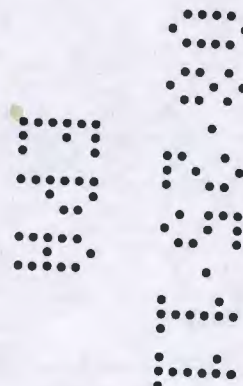


Phone: (785) 296-3786
Fax: (785) 296-0673
www.ksda.gov

Sam Brownback, Governor

August 23, 2011

Attention: Team Leader – Debra Rate (Team 9)
Risk Integration, Minor Use and Emergency Response Branch
U.S. EPA Office of Pesticide Programs (7505P)
Room S4900, One Potomac Yard
2777 Crystal Drive



Dear Ms. Rate:

The Kansas Department of Agriculture has accepted for Special Local Need (SLN) registration the pesticide product Rozol® Prairie Dog Bait, EPA Registration Number 7173-286. The purpose of this SLN is to provide the farmers and ranchers of western Kansas the ability to apply product by use of a mechanical bait application machine in addition to the hand placement of bait described on the Section 3 label. The SLN is for the period of October 1, 2011 to March 15, 2012.

The need for this SLN is two-fold; to reduce exposure of applicators to chlorophacinone, and thus reduce the human health risks of using Rozol Prairie Dog Bait and to limit the economic impact of inefficient control of the black tailed prairie dog.

The Rozol Prairie Dog Bait label states:

- CAUTION: Harmful if swallowed or absorbed through the skin because it may reduce the clotting ability of blood and cause bleeding.
- Do not get in eyes on skin or on clothing. All handlers (including applicators) must wear shoes plus socks, and gloves.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing.
- As soon as possible, wash hands thoroughly after applying bait....

The MSDS for Rozol Prairie Dog Bait states:

- May be harmful if swallowed or absorbed through skin....
- Chronic effects: Prolonged or repeated exposure to small amounts of product can produce cumulative toxicity. Symptoms of toxicity include lethargy, loss of appetite, reduced clotting of blood, and bleeding.

The section 3 label for Rozol Prairie Dog Bait includes the following restriction on the label:

- "Only use forapplication methods specified on this label."

- **Application method:** Hand application of bait, at least 6 inches down prairie dog burrows. This Bait may only be used in underground applications. **Do not apply bait on or above ground level.....**
- **Application:** Apply ¼ cup (53 grams or nearly 2 ounces) of bait at least 6 inches down active prairie dog burrows. **Make sure no bait is left on the soil surface at the time of application.** Applicator must retrieve and dispose of any bait that is spilled above ground or placed less than 6 inches down the burrow entrance.

Mechanical baiting has been shown to be a safe and effective method of application. The baiting season is October 15 – March 15 when prairie dog natural food sources are at their lowest and there is greater bait acceptance. Environmental conditions such as wind, snow, frigid temperatures, etc. limit the time the bait is actually applied to about 30-40 days of the allowable baiting season. Applicator safety becomes an issue. Hand baiting has the potential of exposing the applicator to venomous snake bites and increased pesticide exposure.

Rozol Prairie Dog bait is a restricted use pesticide due to inhalation hazard. Hand baiting significantly increases primary inhalation during the baiting procedure but also secondary inhalation from the bait that adheres to the applicator's clothing. Hand baiting may involve dropping bait into a prairie dog burrow from a scoop used to measure the amount of bait. This may be done from hand height from a standing position. Short grass prairie areas are also typically regions that are windy. The average annual wind speeds for Goodland, KS (NW), and Dodge City, KS, (SW) are 12.5 mph and 14 mph, respectively. The greater the distance above the hole that the bait is released will increase the amount of bait that does not reach the bottom of the burrow opening. One would assume the lower height the bait was released by using the mechanical baiting device would be desirable when baiting under windy conditions. Human error related to fatigue and cold weather exposure will increase the amount of exposed bait on the surface and likely as not result in the bait not placed at least 6 inches below the surface as required by the label. Baiting by mechanical means has been shown to be reliable and to deliver a calibrated amount delivering the bait the mandatory 6 inches below the surface.

Original data submitted prior to the product obtaining a section 3 label was based on hand and mechanical data Lee and Hygnstrom (2007). Data was summarized from 70 trial days with 50 burrows each day. The methods of application were hand, mechanical and a combination of both. Baiting of the burrows was performed in the usual customary manner. The data was analyzed using SAS JMP one-way analysis of variance (ANOVA). Data collected specifically for the purpose of assessing accuracy of bait placement by three methods of application shows no significant differences among the methods. No significant differences were found at the $p < .10$ level between the means of the number of locations bait is visible nor the percentage of burrows where bait is visible, nor the distance from the surface that bait may have been visible, nor the approximate number of grains of bait that is visible. Mechanical baiting is the most efficient and cost effective way to accomplish the task of managing the prairie dog complexes.

Prairie dogs occupy approximately 130,000 acres of rangeland in Kansas. Conservative estimates of prairie dog density are 25 per acre with the range given as 5-35 prairie dogs/ acre which in turn accounts for 30-50 6 inch burrows and mounds/acre. The stocking rate, defined simply as the number of acres necessary to feed an animal unit without overgrazing, ranges from 10-12 acres in western Kansas. To put this in terms of prairie dogs and cattle, 10 to 12 acres of rangeland are needed to support 1 steer **OR** 256 prairie dogs. Using the conservative estimate of 25 prairie dogs per acre, the 10 acres necessary to support the steer will contain about 250 prairie dogs. The land is capable of supporting **either** the steer **or** the prairie dogs, **not both**.

Mechanical baiting becomes a necessity considering a prairie dog mound or burrow may be found approximately every 900 to 1400 feet.

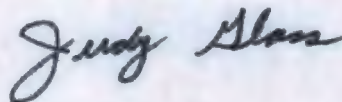
The market value of the livestock in the affected area is in excess of \$4,476,557,000 (incomplete data). A significant portion of the Kansas economy is related either directly or indirectly to livestock production. According to a six year study by Derner, Detling and Antolin, (2006) livestock weight gains decreased linearly depending on the amount of pasture occupied by prairie dogs.

By using a statistical method of regression analysis, they determined that each 10 percent of increased occupation resulted in a 2.1 percent reduction in weight gain. Weight gains decreased 5.5% when 20% of the pasture was colonized by prairie dogs and by 15.4% with 60% colonization. A pasture with a 20% prairie dog occupancy rate reduced the estimated value of livestock weight gain by \$14.95 per steer (March, 2006). A pasture with a 60% prairie dog occupancy rate reduced the estimated value of livestock weight gain by \$37.91 per steer (March, 2006). It is obvious that prairie dogs are a chronic condition hindering the maximization of rangeland production into livestock weight gain.

The reintroduction projects of the black-footed ferret in northwest Kansas rely on the ability to manage black-tailed prairie dog complexes. Mechanical baiting is the most efficient and cost effective way to accomplish the task of managing the prairie dog complexes and reestablishing the ferret so that the species could be removed from the state and federal endangered species list. The Manhattan, KS Regional office of the U.S. Fish and Wildlife Service and the Kansas Department of Wildlife, Parks and Tourism support this SLN. All other required determinations have been defined and the items required for EPA approval of the requested SLN are attached.

The Kansas Department of Agriculture has established the effective date of the SLN as October 1, 2011 and the assigned SLN number **KS-110003**. Please do not hesitate to contact me if you have any questions or concerns. I may be reached at 785-296-3454 or judy.glass@kda.ks.gov.

Sincerely,

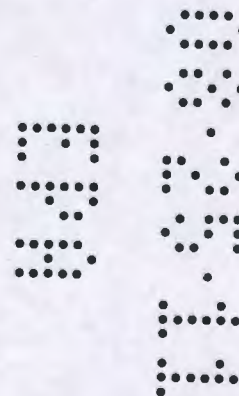


Judy Glass
Pesticide Registration Specialist

Attachments:

EPA Form 8570-25 Application for State Registration of a Pesticide to Meet a Special Local Need
Liphatech Request for SLN letter
Rozol Prairie Dog Bait 24(c) label
Rozol Prairie Dog Bait Section 3 label
Material Safety Data Sheet
Final Cancellation Order for Rozol Prairie Dog Bait
Rozol Prairie Dog Bait Acceptance Letter
Revised Rozol Prairie Dog Bait Section 3 label
KDA 24(c) incident report
Field Efficacy and Hazards of Rozol Bait for Controlling Black-Tailed Prairie Dogs (Cynomys ludovicianus) (Lee and Hygnstrom, 2007)
Field Efficacy and Hazards of Rozol Bait for Controlling Black-Tailed Prairie Dogs (Cynomys ludovicianus) (Lee and Hygnstrom, 2007) statistical analysis
Are Livestock Weight Gains Affected by Black-tailed Prairie Dogs? (Derner, Detling and Antolin, 2006)
2010 Kansas All Cattle Map (Page 42 Kansas Farm Facts 2010 USDA NASS)
US Fish and Wildlife Service Species Report
US Fish and Wildlife Service email communication
Kansas Wildlife, Parks and Tourism Letter

Cc: John Hebert, US EPA
Meredith Laws, US EPA
Katie Howard, USEPA Region VII
Tom Schmit, Liphatech, Inc.
Charles Lee, Kansas State University
Dan Mulhern, US Fish and Wildlife Service Manhattan, KS
Keith Sexson, Kansas Department of Wildlife, Parks and Tourism
Jim Riemann, Kansas Department of Agriculture
Gary Meyer, Pesticide and Fertilizer Program Manager
Shawn Hackett, Field Staff Supervisor
Marie Blankenship, Case Review Officer
Jerry Wilson, Environmental Scientist II





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 1, 2011

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Kansas Department of Agriculture
Pesticide and Fertilizer Program
109 SW 9th Street, 3rd Floor
Topeka, KS 66612-1280

ATTN: Judy Glass, Pesticide Registration Specialist:

Dear State Agency:

The Office of Pesticide Programs acknowledges receipt of the Section 24(c) application/notification for KS110003.

The package is being forwarded to the Product Manager for review.

To ensure that the Agency receives proper notification of your 24(c) applications/notifications it is necessary to use the correct mailing address. All new 24(c) applications should be sent to the following:

Document Processing Desk (SLN)
Office of Pesticide Programs -7504P
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

If you have any questions concerning the administrative screening of the package please contact the Front End Unit at (703)305-5780.

Sincerely,

A handwritten signature in blue ink, which appears to read "Chris Green", is written over the typed name.

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division